

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

UNITED STATES OF AMERICA

v.

MICHAEL CLEMENCE

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No. 1:21-CR-00099-LM

Government's Supplemental Sentencing Memorandum and Request for Hearing

The United States respectfully supplements its earlier submission with this updated information regarding restitution.

The defendant has agreed to the entry of an order of \$3,000 in restitution for each of the 13 victims identified in Paragraph 90 of the final PSR. This represents the minimum amount of restitution that the Court must order under 18 U.S.C. § 2259(b)(2)(B). Several victims in the case, specifically “Honor,” “Dipper,” “Kauzie,” and “Lily,” made requests in excess of the statutory minimum. *See* PSR ¶ 90. In addition, counsel for “Honor” and “Dipper” indicated by letter that they have only recently begun their representation on behalf of these victims and are in the process of gathering records of treatment and other background information, including a psychological evaluation and treatment plan upon which the restitution request will be premised. Counsel has requested that a hearing be set in approximately 90 days for the Court to make a final determination regarding restitution for these victims, as provided in 18 U.S.C. § 3664(d)(5). This additional time will enable counsel to submit complete documentation in support of their restitution requests for the Court’s consideration.

Undersigned counsel would also ask that final determination of restitution awards for “Kauzie” and “Lily” likewise be deferred until the post-sentencing hearing. This will allow time

for the Court to review the voluminous records submitted by counsel in support of the restitution requests for these victims.

Attorney John Newman, counsel for the defendant, was consulted with regard to the request for a hearing under 18 U.S.C. § 3664(d)(5), but he has not yet had the opportunity to confer with his client and was thus unable to take a position.

Dated: March 21, 2022

Respectfully submitted,
JOHN J. FARLEY
United States Attorney

By: /s/ Kasey A. Weiland
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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing has been served on counsel of record via the Court's electronic filing system.

/s/ Kasey A. Weiland
Kasey A. Weiland
Assistant U.S. Attorney